

**To:** Carlin, Jayne[Carlin.Jayne@epa.gov]  
**Cc:** YON Donald R[YON.Donald@deq.state.or.us]  
**From:** YON Donald R  
**Sent:** Mon 3/23/2015 10:04:47 PM  
**Subject:** FW: Oregon NPS Program Management Plan

Jayne DEQ Standards and Assessments staff and managers have asked me to get clarification from you on your comment in the **3.3.2 Integrated Report [303(d) and 305(b)]** section below of the Oregon NPS Plan.

Questions or comments from DEQ are:

- For “high quality waters” under the WQS nomenclature, they don’t get prioritized, they either are or they aren’t, and states aren’t required to list them, so the wording is a bit off if that is indeed what they mean.
- I think the term “High Quality” is referring to waters that have been identified by the state per the definition of a high quality waterbody. I do not think they are referring to the TMDL priorities.
- I am going to forward to Deb for *list of prioritized high quality waters for protection*. If the *list of high priority waters for restoration* means the TMDL priorities for the next 2 years, that is here based on the 2012 IR:
- Oregon’s 2012 TMDL Priorities and Schedule (September 2014)
- EPA may be looking for the priorities from the “303(d) Vision” for 2016-2022, but I don’t know that we have that yet.
- Karla, I received EPA’s comments on the draft Oregon NPS Program Management Plan. One of the comments/questions that I received from Jayne Carlin is the following. Can you answer them soon? *Where is the list of prioritized high quality waters for protection and list of high priority waters for restoration found on Oregon’s website? How can the reader of this plan find that list?*

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### 3.3.2 Integrated Report [303(d) and 305(b)]

Every two years, DEQ is required to assess water quality and report to EPA on the condition of Oregon's waters. DEQ prepares an Integrated Report <http://www.deq.state.or.us/wq/assessment/assessment.htm> that meets the requirements of the federal CWA for Section 305(b) and Section 303(d).

- Federal CWA Section 305(b) requires a report on the overall condition of Oregon's waters.
- Federal CWA Section 303(d) requires identifying waters that do not meet water quality standards and where a TMDL pollutant load limit needs to be developed.

The Integrated Report includes an assessment of each water body where data are available, a comparison of water quality information to Oregon's water quality standards, and identification of the Section 303(d) list of water quality limited waters needing a TMDL. DEQ uses the list of impaired waters to set priorities for TMDL development. DEQ's monitoring provides data that is collected to support decisions and for implementing the NPS Management Program.

The Integrated Report provides a comprehensive evaluation of water quality throughout the state. The NPS Management Program uses information from the Integrated Report and the 303(d) list of impaired waters to identify the waters and watersheds where pollutants are likely related to nonpoint sources in the watersheds. DEQ then can focus and prioritize 319 program activities to prevent, control, and eliminate NPS pollution.<sup>[CJ1]</sup> Will prioritized lists of waters to be protected or restored be included in the future Integrated Reports<sup>[dy2]</sup>?

The Integrated Report information can also complement and support basin-planning efforts, development of basin-based water quality status and action plans, and assist in allocating resources between impaired waters and waters with good water quality.

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[CJ1] Will prioritized lists of waters to be protected or restored be included in the future Integrated Reports?

[dy2] I do not know. Ask Deb or Karla